

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:

Anthony & Cathy Palombo	)	Case No. 17-20828-CMB
Debtor,	)	
-----	)	
Anthony & Cathy Palombo	)	
Debtor/Movant	)	Chapter 13
v.	)	
	)	
US BANK, NA	)	
Creditor/Respondent,	)	
	)	
Ronda Winnecour	)	
Trustee/Respondent	)	

**DECLARATION OF COUNSEL THAT THE EXISTING CONFIRMED PLAN AND / OR  
ORDER DATED 3/17/17 IS SUFFICIENTLY FUNDED TO ACCOUNT FOR THE CHANGE  
IN MORTGAGE PAYMENT**

AND NOW, comes Anthony & Cathy Palombo by and through HIS/HER/THEIR

Counsel, Attorney Russell A. Burdelski, Esquire and avers the following:

1. The last confirmed/proposed plan dated **3/17/17** and / or Confirmation Order directed that the regular monthly payment to US BANK, NA be **\$827.00** per month.
2. On 3/12/18, to US BANK, NA filed a notice of change of monthly mortgage payment to **\$816.11** per month beginning 5/2018 which is the same or lower than the amount provided for in the plan and / or Confirmation Order, thus an amended plan is not necessary as the plan is adequately funded.

WHEREFORE, the debtor so reports.

Respectfully submitted,

BURDELSKI LAW OFFICES

DATE\_\_March 13, 2018\_\_

/s/Russell A. Burdelski, Esquire  
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